

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST LABOR ORGANIZATIONS
OR ITS AGENTS

DO NOT WRITE IN THIS SPACE	
Case 20-CC-3339	Date Filed 5/28/99

INSTRUCTIONS: File an original together with four copies and a copy for each additional charged party named in item 1 with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. LABOR ORGANIZATION OR ITS AGENTS AGAINST WHICH CHARGE IS BROUGHT

a. Name California Nurses Association		b. Union Representative to contact Eric Hall	
c. Telephone No. 510-273-2200 Fax No. 510-663-1625	d. Address (Street, city, state, and ZIP code) 2000 Franklin Street, Suite 300 Oakland, California 94612		

e. The above-named organization(s) or its agents has (have) engaged in and is (are) engaging in unfair labor practices within the meaning of section 8(b), subsection(s) (list subsections) 8(b)(4)(B) of the National Labor Relations Act, and these unfair labor practices are unfair practices affecting commerce within the meaning of the Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Since on or about May 24, 1999, and at all times thereafter, the above-named labor organization, by its officers, agents, and representatives, has threatened to engage in or to induce or encourage secondary employers and other persons engaged in commerce or in industries affecting commerce to engage in, a strike or a refusal in the course of their employment to use, process, or otherwise handle or work on goods, articles, materials, or commodities or to perform services, where an object thereof is to force or require such persons to cease using, selling, handling, transporting, or otherwise dealing in the products or services of Novato Community Hospital, or to cease doing business with Novato Community Hospital.

Since on or about May 24, 1999, the above-named labor organization has threatened to engage in a strike and picketing on June 9, 1999, at the facilities of Novato Community Hospital, a health care institution, "which is not otherwise lawful" under Section 8(b)(4)(B) of the Act because said labor organization failed to provide the requisite 10-day notice under Section 8(g) of its intention to engage in such conduct following expiration of the 60-day notice required to be given to the Federal Mediation and Conciliation Service and the corresponding State agency under Section 8(d), and because said labor organization failed to provide both the requisite written notice of proposed contract termination or modification to the employer and the requisite notice of the existence of a dispute to the State agency established to mediate and conciliate such disputes, as required by Section 8(d) of the Act. During this same period, said labor organization has also threatened to engage in a strike and picketing on June 9, 1999, at 180 Roland Way, Novato, California, a site where Novato Community Hospital currently has no employees and performs no services.

The Employer requests injunctive relief under Section 10(l) of the National Labor Relations Act.

3. Name of Employer Novato Community Hospital		4. Telephone No. 415-899-9550	
		Fax No. 415-899-9584	
5. Location of plant involved (street, city, state and ZIP code) 1625 Hill Road, Novato, California 94947		6. Employer representative to contact F. Curt Kirschner David J. Rejs	
7. Type of establishment (factory, mine, wholesaler, etc.) Hospital	8. Identify principal product or service Health Care	9. Number of workers employed 300	
10. Full name of party filing charge Same as above		12. Telephone No. Same as above	
11. Address of party filing charge (street, city, state and ZIP code.) Same as above		Same as above	

13. DECLARATION

I declare that I have read the above charge and that the statements therein are true to the best of my knowledge and belief.
By David J. Rejs David J. Rejs, F. Curt Kirschner, attorneys
(Signature of representative or person making charge) (Print/type name and title or office, if any)
O'Melveny & Myers LLP 415-984-8701
Address 275 Battery Street, San Francisco, CA 94111 (Fax) 415-984-8700 May 28, 1999
(Telephone No.) (date)